



May 26, 2025

The Honorable Richard G. Andrews
United States District Court, District of Delaware
Caleb Boggs Federal Building
844 N. King Street, Unit 9, Room 6325
Wilmington, DE 19801-3555

Re. Motion to Waive Local Counsel Requirement for Amicus Submission: Case #: 1:24-cv-00312-RGA, Lavi et al v. UNRWA USA National Committee Inc.

Dear Judge Andrews:

I am writing to follow up on my correspondence dated March 24, 2025, where I submitted a motion to waive the rule requiring sponsorship for pro hac vice admission for the purpose of submitting an amicus brief in the above captioned case being heard in your court.

Since the time of my original correspondence there has been no activity on my submission other than a letter on April 2, 2025 from counsel for Defendant opposing my motion and arguing that there is no need for an amicus brief regarding the application of the Justice Against Sponsors of Terrorism Act.

Because the court has not yet acted on my motion and counsel for Defendant has taken a position on the proposed amicus submission without even seeing the amicus brief that I have drafted, I would like to ask the court to make a determination on my motion.

Moreover, I would also like to note that contrary to the assertion of counsel for Defendants that the proposed amicus brief is not needed, such brief is based on a law review article that I recently published in the Boston University Review of Banking and Financial Law, "Judicial Aiding and Abetting of Terror" (43 Rev. Banking & Fin. L. 589 (2024), available at <https://www.bu.edu/rbfl/files/2025/02/GREENDORFER-MACHOL.pdf>) and directly addresses many of the issues relating to aiding and abetting liability in the instant case.

Sincerely,

A handwritten signature in blue ink that reads 'Marc A. Greendorfer'.

Marc A. Greendorfer
President
Zachor Legal Institute
Marc@ZachorLegal.org
(925) 328-0128

Zachor Legal Institute
PO Box 6774
Bozeman, MT 59771

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